

Modern slavery and human trafficking statement 2017

1. Introduction

This statement sets out Johnson Fleming’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

Being part of the Financial Services industry, Johnson Fleming recognises that it has a responsibility to take a robust approach to slavery and human trafficking, both within our directly employed workforce or any of our supply chain.

Johnson Fleming is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2. Organisational structure and supply chains

Johnson Fleming currently operates solely in the UK, and provides pensions and employee benefits consultancy and outsourced administration support to UK businesses.

3. Policy

Our HR department is responsible for putting in place and reviewing policies and the process by which they were developed.

4. Relevant policies

Johnson Fleming operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy

Johnson Fleming encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise them under the protocols of this policy.

Disciplinary policy and Bullying and Harassment policy

The company's code makes clear to employees the actions and behaviour expected of them when representing Johnson Fleming. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

Recruitment policy

Johnson Fleming recruitment processes are transparent and reviewed on a regular basis. Only specified, reputable employment agencies are used to assist with recruitment needs. We always verify the practices of any new agency we utilise before accepting workers from that agency.

Johnson Fleming undergoes a robust and diligent selection process in the selection of these agencies, including evidencing the agencies policies in the area of Modern Slavery and Traffic.

Part of this selection process will require agency partners to demonstrate steps taken to ensure slavery and trafficking is not taking part in any part of their business.

5. Training

Johnson Fleming will ensure that key staff will undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate.

6. Awareness Raising Programme

Johnson Fleming will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues.
- What external help is available, for example through the Modern Slavery Helpline.
- Telephone: **08000 121 700** Website: <https://www.modernslaveryhelpline.org/>

This policy applies to Johnson Fleming Group Limited and all of its' subsidiary and associated companies.

As a commitment to continuous improvement of all Johnson Fleming Group policies, this policy will be reviewed periodically to ensure it remains in line with company objectives and compliant with legislation.